# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	8 §	Chapter 11
	§	•
STEWARD HEALTH CARE SYSTEM	§	Case No. 24-90213 (CML)
LLC, et al.,	§	
	§	(Jointly Administered)
Debtors. <sup>1</sup>	§	
	§	Re: Docket No. 115

## STIPULATION EXTENDING DEBTORS' DEADLINE TO COMPLY WITH SECTION 345(b) OF THE BANKRUPTCY CODE

This stipulation (the "Stipulation") is entered into by and between Steward Health Care System LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (together, the "Debtors"), and the Office of the United States Trustee for Region 7 (the "U.S. Trustee").

WHEREAS, on May 6, 2024, the Debtors each filed a voluntary petition under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") and continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

WHEREAS, on May 6, 2024, the Debtors filed the Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms and Intercompany Arrangements, (C) Continue Intercompany Transactions, and (D) Continue Employee Credit Card Program; (II) Extending Time to Comply with Requirements of 11 U.S.C. § 345(b); and (III) Granting

A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at https://restructuring.ra.kroll.com/Steward. The Debtors' service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

Related Relief (Docket No. 5) (the "Cash Management Motion"),<sup>2</sup> pursuant to which the Debtors requested, among other things, an extension of time to comply with certain requirements of section 345(b) of the Bankruptcy Code;

WHEREAS, on May 7, 2024 the Court entered an interim order approving the Cash Management Motion (Docket No. 115) (the "Interim Cash Management Order"), which extended the time by which the Debtors must comply with section 345(b) of the Bankruptcy Code by forty-five (45) days through and including June 21, 2024, and provides the Debtors may obtain a further extension of such 45-day period by entering into a written stipulation with the U.S. Trustee and filing such stipulation on the Court's docket without the need for further Court order.

#### NOW, THEREFORE, IT IS STIPULATED AND AGREED as follows:

- 1. The Debtors' deadline to comply with section 345(b) of the Bankruptcy Code is extended through and including August 5, 2024.
- 2. Except as set forth herein, the Interim Cash Management Order shall remain in full force and effect.
- 3. The entry of this Stipulation is without prejudice to the Debtors' rights to seek further extensions of the Debtors' deadline to comply with section 345(b) of the Bankruptcy Code.

2

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

Date: June 19, 2024 Houston, Texas

#### /s/ Clifford W. Carlson

WEIL, GOTSHAL & MANGES LLP Gabriel A. Morgan (24125891) Clifford W. Carlson (24090024) Stephanie N. Morrison (24126930)

700 Louisiana Street, Suite 3700

Houston, Texas 77002 Telephone: (713) 546-5000

Facsimile: (713) 224-9511 Email: Gabriel.Morgan@weil.com

Clifford.Carlson@weil.com Stephanie.Morrison@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP

Ray C. Schrock (admitted *pro hac vice*)
Candace M. Arthur (admitted *pro hac vice*)
David J. Cohen (admitted *pro hac vice*)

767 Fifth Avenue

New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007

Email: Ray.Schrock@weil.com

Candace.Arthur@weil.com DavidJ.Cohen@weil.com

Attorneys for Debtors and Debtors in Possession

#### /s/ Ha Nguyen

OFFICE OF THE UNITED STATES TRUSTEE
Ha Nguyen
Jana Smith Whitworth
515 Rusk Street, Suite 3516
Houston, Texas 77002
Telephone: (713) 718-4650

Facsimile: (713) 718-4670

Email: Ha.Nguyen@usdoj.gov Jana.Whitworth@usdoj.gov

### **Certificate of Service**

I hereby certify that on June 19, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtors' claims, noticing, and solicitation agent.

<u>/s/ Clifford W. Carlson</u>
Clifford W. Carlson